

COHEN & GREEN

January 18, 2023

Hon. Frederic Block, Senior Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

By Electronic Filing.

Re: Velez v. Prusayev, 22-CV-1810 (FB) (VMS)

Dear Judge Block:

I am co-counsel for Plaintiffs in the above-captioned matter. I write jointly with Defendants, per the Court's Motion Rule 1(D), to request an extension of 45 more days to apply for costs (inclusive of attorneys' fees under 42 U.S.C. § 1988), consistent with the judgment entered in this case. *See* ECF No. 28. Per the Court's October 21, 2022 Minute Order, the current deadline is November 24 2022. Plaintiffs previously applied for three extensions (ECF Nos. 29, 30, and 31) which the Court granted, making this the fourth extension.

Plaintiffs served a demand and copies of attorney time sheets on September 19, 2022. As we stated in the last extension, we are still waiting for Defendants' counter-offer. We understand from counsel that a request for authority has now been made (since the last motion), and Defendants have made progress in evaluating the demand. Thus, we expect to be able to begin substantive conversations soon.

This further time will allow the parties to see if fees can be resolved without litigation. If this motion is granted, the new deadline will be Thursday, March 9, 2023.

As always, I thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN & GREEN P.L.L.C.

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cc:

All relevant parties by ECF.